

STATE OF MISSISSIPPI

IN THE COUNTY COURT OF HARRISON COUNTY

I, Gayle Parker, Clerk of County Court of Harrison County, Mississippi, do hereby certify that the above and foregoing constitutes a true and correct copy of the entire file

Georgia Karlson

VS

PLAINTIFF

NO. D2401-15-1551

City of Gulfport, MS, Shawn Williams,
George Vitteck & John Does 1-5

DEFENDANT

as the same now appears.

AND I FURTHER CERTIFY that said County Court is a Court of Record with an official seal, and that I, as Clerk of said County Court, am the custodian of the records and seal of this said court, at the CITY OF GULFPORT on this 9th day of

December, 2015.

GAYLE PARKER
Clerk of County Court of Harrison
County, Mississippi

By: Hamisha Remmy, Jr.



Gayle Parker, Circuit Clerk
Harrison County
PO Box 998
Gulfport, MS 39502



**IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D24015-1551

**CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS , GEORGE VITTECK and
JOHN DOES 1 - 5**

DEFENDANTS

COMPLAINT

PLAINTIFF REQUESTS A TRIAL BY JURY

NOW COMES the Plaintiff, Georgia Karlson, by and through her attorneys, Brown Buchanan P.A., and files this her Complaint for deprivation of her civil rights resulting in physical and mental injuries, and related and resultant damages, against these Defendants and in support of her Complaint would state the following:

PRELIMINARY STATEMENT OF CLAIM

This is a Federal Civil Rights lawsuit, claim and action brought pursuant to 42 U.S.C. § 1983 and 42 U.S.C. § 1988, and under the protections, privileges and provisions afforded the Plaintiff, Georgia Karlson, and any other similarly situated citizen, under the Due Process Clause of the Fourth Amendment to the United States Constitution and the Fourteenth Amendment to the United States Constitution, for the use of excessive, unreasonable, unwarranted and unnecessary and injurious force against her by the police officers of the City of Gulfport,

Mississippi, acting under color of law, resulting in significant and permanent disability.

I. PARTIES

1. Plaintiff, Georgia Karlson, is an adult resident citizen of Harrison County, Mississippi.
2. The Defendant, The City of Gulfport, Mississippi, is a political subdivision of the State of Mississippi, and is the entity having ultimate authority, responsibility and control of and for the oversight of the decisions affecting and funding of the Gulfport jail and the Gulfport Police Department. Defendant may be served with process by serving the Hon. Billy Hewes, Mayor, at his office at City Hall, 15th Street, Gulfport, Mississippi 39501.
3. The Defendant, Shawn Williams, is an adult resident citizen of Harrison County, Mississippi, who at all relevant times was acting in the course and scope of his employment with the City of Gulfport, Mississippi, and who may be served with process by personal service at 1400 28th Street, Gulfport, Mississippi 39501.
4. The Defendant, George Vitteck, is an adult resident citizen of Harrison County, Mississippi, who at all relevant times was acting in the course and scope of his employment with the City of Gulfport, Mississippi, and who may be served with process by personal service at 16023 April Drive, Gulfport, Mississippi, 39503.

5. The Defendant John Doe 1 is an unidentified police officer who was involved in the subject incident and who at all relevant times was acting in the course and scope of his employment with the City of Gulfport, Mississippi.

6. The Defendants John Does 2 - 5 are unidentified police officers who were at all relevant times was acting in the course and scope of their employment with the City of Gulfport, Mississippi, when they intentionally destroyed the security coverage of the subject incident knowing it contained evidence favorable to the Plaintiff.

II. JURISDICTION AND VENUE

7. This is a Federal Civil Rights lawsuit, claim and action brought pursuant to 42 USC § 1983, 42 USC § 1985 and 42 USC § 1988, and under the protections, privileges and provisions afforded the Plaintiff, Georgia Karlson, and any other similarly situated, accused and arrested citizen temporarily incarcerated as a "pre-trial detainee" under the Due Process Clause of the Fourth Amendment to the United States Constitution and the Fourteenth Amendment to the United States Constitution, and also the protections afforded incarcerated prisoners under the provisions and standards of the Eighth Amendment to the United States Constitution should the Court determine the Plaintiff to be entitled to the protections afforded to convicted offenders incarcerated in a penal institution as prisoners.

8. The incident that is the subject of this lawsuit occurred on November 8, 2014, in Gulfport, Harrison County, Mississippi.

9. Venue in this Court is proper because the incident giving rise to the claims of the Plaintiff occurred in Gulfport, Harrison County, Mississippi.

III. FACTS

10. On November 8, 2014, at approximately 3:30 a.m., Plaintiff and Patrick Rogers were in their apartment, engaged in an argument regarding finances. At some point during this argument, Plaintiff scratched Mr. Rogers' neck. In response to this, Mr. Rogers pushed Plaintiff. Plaintiff then called the Gulfport Police Department.

11. After receiving Plaintiff's call, Officer Shawn Williams (265), Officer George Vitteck (238) and a third officer (whom we are unable to identify at this time) were dispatched to Plaintiff's residence. When they arrived at Plaintiff's residence, the officers separated Plaintiff and Mr. Rogers. Officer Vitteck spoke with Plaintiff and Officer Williams spoke with Mr. Rogers. The officers then interviewed two (2) of Plaintiff's children. After speaking with everyone, the officers placed Plaintiff and Mr. Rogers into handcuffs and transported them, in separate vehicles, to the Gulfport Police Department.

12. Upon arrival at the Gulfport Police Department, Plaintiff was placed into one (1) of three (3) holding cells. Plaintiff was emotional and upset from the arrest and from being incarcerated. When she was placed into the holding cell, Plaintiff knocked on the glass. In response to Plaintiff knocking on the glass, Officer Williams said: "Oh no, here we go." Approximately five (5) minutes after Plaintiff knocked on the glass, three (3) Gulfport Police Officers, including Officer Williams and Officer Vitteck, entered Plaintiff's cell. When he entered Plaintiff's cell, Officer Williams instructed Plaintiff to "get up." Plaintiff stated: "Leave me alone. Don't touch me." Plaintiff then repeated this phrase. In response to Plaintiff saying "Leave me alone. Don't touch me," Officer Williams stated to Plaintiff: "You're f___ ing crazy." Plaintiff then started to get up in compliance with Officer Williams' command. As Plaintiff was getting up, Officer Williams grabbed Plaintiff's right arm, in the biceps area, pulled her left hand behind her back and violently shoved her upward, approximately three (3) steps, into the wall. Plaintiff hit the wall with her shoulder, face and nose. As a result of being forcibly shoved into the wall, Plaintiff immediately began to profusely bleed from her nose. She was transported to Gulfport Memorial Hospital.

13. As a result of this incident, Plaintiff was charged with Disorderly Conduct - Failure to Comply and Simple Domestic Violence. The domestic violence charge was remanded to file on January 15, 2015. On that same date

(January 15, 2015), the charge of Disorderly Conduct - Failure to Comply was dismissed because, as stated by the Gulfport Municipal Court in its Order: "the City failed to preserve the video that was requested by the Defendant. The video is alleged to have exculpatory evidence."

14. The City of Gulfport and John Doe Defendants 2 - 5 intentionally destroyed and failed to retain and produce the security coverage of this incident.

15. Shawn Williams, George Vitteck and John Doe 1, while acting under color of law, willfully, wantonly and intentionally used excessive force against Plaintiff in an act of corporal punishment amounting to an assault and battery, resulting in significant injury to the Plaintiff.

16. After Plaintiff suffered these gross abuses and injuries, John Doe Defendants 2 - 5, employees of the Gulfport Police Department acting within the course and scope of their employment, and with final decision making authority, engaged in acts to falsely deny and/or cover-up what had occurred by, *inter alia*, destroying the surveillance coverage of the subject incident.

17. The Defendant, the City of Gulfport, by and through its officials, failed to take any meaningful action to prevent the continuation of this type of abuse and destruction of evidence, thus evidencing a "policy" and "deliberate indifference" to the known consequences of the policy, which foreseeably and consequently

resulted in the abuse and constitutional violations against incarcerated persons, including Plaintiff.

18. The Defendant, the City of Gulfport and/or its appointed officials, granted and clothed with final policy and/or decision making authority, whether actual or de facto, participated, encouraged, authorized or acquiesced in the existence of subordinate officials' failure to properly supervise, control, direct, discipline and/or train Gulfport Police officers to prevent these constitutional violations, resulting directly, foreseeably and consequently in continuing abuses of and use of injurious excessive force on inmates and detainees held by the City of Gulfport, including Plaintiff. In this case, there was no corrective action taken against any of the officers involved in the subject incident.

19. The City of Gulfport, Mississippi was and is vested with the final decision making authority and responsibility to hire, train, supervise, set policies and determine procedures, enforce policies and procedures, delegate authority and generally oversee and supervise the daily operation of the entire Gulfport Police Department and all its divisions, departments and personnel. As such, the City of Gulfport was and is directly responsible for the handling of all persons detained, confined, incarcerated or otherwise held, regardless of individual status, within the City of Gulfport.

20. Defendant, Shawn Williams was at all times relevant to this Complaint, an employee of the City of Gulfport and was a police officer for the City of Gulfport. As a police officer, Officer Williams participated in the daily operations of his specific job, and he was directly responsible for handling persons detained, confined, incarcerated or otherwise held, regardless of individual status. Officer Williams is being sued individually and as a state official acting under color of state law.

21. Defendant, George Vitteck was at all times relevant to this Complaint, an employee of the City of Gulfport and was a police officer for the City of Gulfport. As a police officer, Officer Vitteck participated in the daily operations of his specific job, and he was directly responsible for handling persons detained, confined, incarcerated or otherwise held, regardless of individual status. Officer Vitteck is being sued individually and as a state official acting under color of state law.

22. John Doe Defendant 1 was at all times relevant to this Complaint, an employee of the City of Gulfport and was a police officer for the City of Gulfport. As a police officer, Officer Williams participated in the daily operations of his specific job, and he was directly responsible for handling persons detained, confined, incarcerated or otherwise held, regardless of individual status. Officer

Williams is being sued individually and as a state official acting under color of state law.

23. John Doe Defendants 2 - 5 were at all times relevant to this Complaint, employees of the City of Gulfport responsible for the maintenance of the security coverage in the jail. They were directly responsible for handling persons detained, confined, incarcerated or otherwise held, regardless of individual status. John Doe Defendants 2 - 5 are being sued as individuals and as state officials acting under color of state law.

**IV. VIOLATION OF CONSTITUTIONAL PROTECTIONS
AFFORDED PRE-TRIAL DETAINEE GEORGIA
KARLSON RESULTING IN SERIOUS INJURY BY POLICE
OFFICERS ACTING UNDER COLOR OF STATE LAW**

24. This is a Federal Civil Rights lawsuit, claim and action brought under 42 USC § 1983, USC § 1985, USC § 1988 and under the protections and provisions afforded the Plaintiff and any similarly situated accused and arrested citizen as a "pre-trial detainee" under the Due Process Clause of the Fourth Amendment to the United States Constitution and the Fourteenth Amendment to the United States Constitution (afforded the same rights as incarcerated prisoners under the provisions and standards of the Eighth Amendment to the United States Constitution) as these Amendments apply to pre-trial detainees held in certain circumstances and conditions similar and/or analogous to convicted offenders incarcerated in a penal institution as prisoners.

25. While temporarily held in the Gulfport Police Department holding cell, on or about November 8, 2014, Plaintiff was brutally beaten by the Defendants who were using excessive force, while acting in the course and scope of their employment and while acting under color of state law as local officials for the City of Gulfport, Mississippi, resulting in serious injuries and a gross deprivation of protective constitutional provisions and complete denial of Plaintiff's due process and related civil rights. In addition, Defendants conspired to, and did in fact, intentionally destroy evidence, which constitutes further actions that were taken to deny Plaintiff of her due process and related civil rights.

26. All the injurious and harmful actions against Plaintiff have been committed while Defendants were acting under "color of law", specifically state law and their authority as police officers, resulting in gross deprivations of the Plaintiff's afforded and asserted constitutional rights, interests, immunities and protections, resulting in serious, severe and significant physical and mental injuries.

V. INTENTIONAL USE OF INJURIOUS EXCESSIVE FORCE

27. Defendants Williams, Vitteck and John Doe Defendant 1, who were police officers working for the City of Gulfport, used unnecessary, unreasonable and wanton force on the Plaintiff, a pre-trial detainee, when she was brutally beaten on or about November 8, 2014. Such force was intentional, malicious,

sadistic, excessive, not applied in good faith and was used for the sole purpose of causing harm and inflicting pain. Such force amounted to willful punishment of a pre-trial detainee.

28. The force described in the preceding paragraph was intentional, unnecessary, wanton and willful excessive force. This force was without any justification. The injurious blows were not in self-defense. The injurious blows amounted to an assault and battery. And:

- A. Was grossly disproportionate to any need for use of force and was inspired by malice rather than merely careless or unwise zeal.
- B. Said force amounted to an abuse of official power, intentional to the extent that it "shocks the conscience."
- C. Such force evidenced a "deliberate indifference" to the safety, well-being and protections afforded Plaintiff.
- D. Such force caused significant pain and unbearable suffering to Plaintiff.
- E. Such force amounted to cruel and unusual punishment.
- F. Such force caused and directly resulted in substantial, severe, significant, debilitating and permanent physical, mental and psychological injuries to Plaintiff.

29. Defendants' actions were sadistic in nature and for the sole purpose of exacting corporal punishment and revenge and/or other satisfaction for some insult/offense they believed Plaintiff had committed.

30. Prior to the assault, Plaintiff was contained within a Holding Cell.

31. Prior to the assault, Plaintiff was not a threat to anyone.

32. Prior to the assault, Plaintiff had merely been tapped on the glass inside the Holding Cell and said "don't touch me."

33. After the assault by Defendants, Plaintiff suffered significant, immediate and painful injury to her face, head and nose.

34. These intentional injurious actions by the Defendants violated the due process protections afforded Plaintiff under the Fourth and Fourteenth Amendments to the U.S. Constitution and violated Plaintiff's protections afforded under these Amendments as they apply to incarcerated persons being held as pre-trial detainees.

VI. CONSPIRACY TO COVER-UP BEATING BY POLICE OFFICERS

35. Supervisors and supervisory personnel of the City of Gulfport's police department had actual knowledge and acquiescence of their police officers and other employees' injurious actions against Plaintiff.

36. After Plaintiff's beating, Defendants participated in a conspiratorial scheme to camouflage, cover-up, falsely explain and/or deny what in truth and in fact happened to Plaintiff.

37. In aid of their conspiracy, Defendants directly, intentionally and falsely accused Plaintiff of assaulting police officers and committing further criminal acts for which Plaintiff could be charged, prosecuted and punished.

38. Defendants also destroyed evidence that was favorable to the Plaintiff.

39. In furtherance of this conspiracy, Defendants prepared false reports of the incident and circumstances surrounding the beating of Plaintiff.

40. These actions were part of an effort to conceal / justify the pattern of abuse and misuse of force used on pre-trial detainees such as Plaintiff, and officials, all as the ranking officers with final decision making authority for the City of Gulfport and Gulfport Police Department aided and abetted the misuse of force and the conspiracy related thereto, by either condoning such acts and/or by failing to take appropriate actions and measures in order to prevent the abusive and injurious actions of the officers involved; thus, subjecting the Plaintiff to abuse in violation and deprivation of rights afforded to him as set forth above.

VII. FAILURE TO PROPERLY TRAIN AND SUPERVISE

41. The above described incident involving the brutal beating of Plaintiff was a direct result of the City of Gulfport's final policy making and failing to properly train and/or supervise the police officers and their supervisors.

42. With proper training, the subject incident could not have occurred.
43. Such abject failure by the Defendant, the City of Gulfport, to properly train and/or supervise its police officers and their supervisors constitutes deliberate indifference to Plaintiff's and other detainees safety, welfare and their constitutional protections, privileges, immunities and rights.
44. The direct actions and knowledge of the City of Gulfport with final policy making authority intentionally allowed this abject lack of training and/or supervision to become so pervasive, endemic and well settled as to constitute a custom and policy.

VIII. DECEPTIVE STATEMENTS AND CONSPIRACY TO COVER-UP

45. After the assault and brutal beating, Defendants filed a report of the incident that failed to accurately account for what occurred.
46. In addition, the Defendants destroyed evidence that was beneficial to the Plaintiff.

47. All of these actions were in furtherance of an ongoing conspiracy to allow abuse of pre-trial detainees and then falsely deny, conceal and cover-up what had occurred.

IX. PLAINTIFF'S PERMANENT INJURIES AND DAMAGES

48. Plaintiff suffered and still suffers from serious, significant and permanent injuries, mental and physical disabilities as a direct result of the brutal

beating and cruel and inhumane treatment she received on or about November 8, 2014, at the hands of the Defendants.

49. As a direct consequence of her severe and brutal assault, Plaintiff suffered and continues to suffer from physical pain, mental and emotional anguish.

50. Since her severe and brutal beating and directly and as a consequence of the debilitating injuries and related impairments, Plaintiff suffers from physical impairments, which will require future medical treatment.

51. Since her severe and brutal beating, and directly and as a consequence of the debilitating injuries and related impairments, Plaintiff suffers from mental impairments, which will require future medical treatment.

X. STATE LAW CLAIMS

A. Compliance with the Mississippi Tort Claims Act

52. The Plaintiff, Georgia Karlson, has properly and fully complied with the requirements of the Mississippi Tort Claims Act, Miss.Code Ann. § 11-46-11 by providing her pre-suit Notice of Claims delivered by certified mail, to which no response was received.

53. Paragraphs 1 - 47 of the Complaint are incorporated into Paragraph 48 of the Complaint as if set forth, herein, in full.

ASSAULT AND BATTERY

54. The Defendants are liable, both individually and jointly and severally, for the assault and battery. Defendants' actions were willful, wanton, directed to cause harm, were of such a nature as to evoke outrage and revulsion, and caused severe physical and mental injuries to the Plaintiff.

55. The Plaintiff's injuries were foreseeable from Defendants' intentional actions.

56. The Defendants, acting in accordance with their policies, customs, procedures and habits, intentionally assaulted Plaintiff without cause.

57. The Defendants, acting in accordance with their policies, customs, procedures and habits, intentionally disposed of evidence that was helpful to Plaintiff's allegations and case.

58. As a direct and proximate result of this use of excessive force, Plaintiff suffered a nasal fracture, nasal laceration and facial contusion. Plaintiff may have to undergo future medical treatment, including but not limited to, nasal surgery. Plaintiff continues to suffer from headaches and neck pain, as well and mental pain and suffering.

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

59. The Defendants are liable, both individually and jointly and severally, for the intentional infliction of emotional distress. Defendants' actions were

willful and wanton, directed to and intended to cause harm, were of such a nature as to evoke outrage and revulsion and caused Plaintiff to suffer sever emotional distress.

60. The Plaintiff's injuries were foreseeable from Defendants' intentional actions.

61. Defendants, acting in accordance with their policies, customs, procedures and habits, intentionally assaulted Plaintiff without cause.

62. The Defendants, acting in accordance with their policies, customs, procedures and habits, intentionally disposed of evidence that was helpful to Plaintiff's allegations and case.

63. As a direct and proximate result of this use of excessive force, Plaintiff suffered a nasal fracture, nasal laceration and facial contusion. Plaintiff may have to undergo future medical treatment, including but not limited to, nasal surgery. Plaintiff continues to suffer from headaches and neck pain, as well and mental pain and suffering.

XI. CONCLUSION

Plaintiff, Georgia Karlson, while temporarily held in a Gulfport Police Department holding cell, on or about November 8, 2014, was brutally beaten by the Defendants, who were using excessive force, while acting in the course and scope of their employment and while acting under color of state law as local

officials for the City of Gulfport, Mississippi, resulting in serious injuries and a gross deprivation of protective constitutional provisions and complete denial of Plaintiff's due process and related civil rights. In addition, Defendants conspired to, and did in fact, intentionally destroy evidence, which constitutes further actions that were taken to deny Plaintiff of her due process and related civil rights.

XII. RELIEF REQUESTED

WHEREFORE, PREMISES CONSIDERED, the Plaintiff, Georgia Karlson, respectfully requests a jury trial to present the evidence and eye-witnesses testimony concerning the abusive and injurious actions of these Defendants against her and at the conclusion of the requested trial, that this Court enter a judgment as follows:

- (1) Against the Defendants acting under color of state law, jointly and/or severally, in an award for all actual and compensatory damages, past, current and future, for and from the injuries, disabilities and suffering sustained by the Plaintiff, Georgia Karlson.
- (2) Against the named Defendants, jointly and severally, for all Plaintiff's reasonable attorney's fees pursuant to 42 USC § 1988 and all associated allowable costs, related litigation expenses and recoverable expert witness fees.

(3) Against the named Defendants for other such relief as this Honorable Court may deem necessary, appropriate, equitable and just under the circumstances of this action.

RESPECTFULLY SUBMITTED

GEORGIA KARLSON

By: BROWN BUCHANAN P.A.

By: PATRICK R. BUCHANAN

Patrick R. Buchanan (MSB No. 8439)
Brown Buchanan P.A.
234 Caillavet Street, Suite 100
Post Office Box 1377
Biloxi, MS 39533
Telephone: 228.374.2999
Facsimile: 228.435.0035
mailb@brownbuchanan.com

COVER SHEET		Court Identification Docket #		Case Year	Docket Number		
Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		24	C	2015	01551		
Mississippi Supreme Court Administrative Office of Courts		County #	Judicial District	Court ID (CH, CI, CO)	Local Docket ID		
Form AOC/01 (Rev 2009)		102015	Month	Date	Year	Case Number if filed prior to 1/1/94	
In the COUNTY		Court of HARRISON		County	FIRST	Judicial District	
Origin of Suit (Place an "X" in one box only)		<input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Relinstated <input type="checkbox"/> Remanded <input type="checkbox"/> Recopened		<input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Joining Suit/Action		<input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Appeal	
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form							
Individual KARLSON		GEORGIA		Maiden Name, if applicable		M.I.	Jr/Sr/III/IV
Last Name		First Name		Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:			
Estate of _____				Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:			
Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:		D/B/A or Agency _____					
Business		Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated					
Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below:							
D/B/A _____							
Address of Plaintiff		2202 MORAIS PLACE, UNIT A, GULFPORT, MS 39507					
Attorney (Name & Address)		Patrick R. Buchanan, Brown Buchanan P.A., P.O. Box 1377, Biloxi, MS 39533					
Check (x) if Individual Filing Initial Pleading is NOT an attorney		MS Bar No. 8439					
Signature of Individual Filing:							
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form							
Individual		Last Name		First Name		Maiden Name, if applicable	
Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:		Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:		Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:		M.I.	
Estate of _____						Jr/Sr/III/IV	
Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:		D/B/A or Agency _____					
Business		City of Gulfport, Mississippi - City Hall, 15th Street, Gulfport, MS 39501					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated							
Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below:							
D/B/A _____							
Attorney (Name & Address) - If Known		MS Bar No. _____					
Damages Sought:		Compensatory \$ _____		Punitive \$ _____		Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet	
Nature of Suit (Place an "X" in one box only)							
Domestic Relations		<input type="checkbox"/> Business/Commercial		<input type="checkbox"/> Children/Minors - Non-Domestic		Real Property	
<input type="checkbox"/> Child Custody/Visitation		<input type="checkbox"/> Accounting (Business)		<input type="checkbox"/> Adoption - Contested		<input type="checkbox"/> Adverse Possession	
<input type="checkbox"/> Child Support		<input type="checkbox"/> Business Dissolution		<input type="checkbox"/> Adoption - Uncontested		<input type="checkbox"/> Ejectment	
<input type="checkbox"/> Contempt		<input type="checkbox"/> Debt Collection		<input type="checkbox"/> Consent to Abortion Minor		<input type="checkbox"/> Eminent Domain	
<input type="checkbox"/> Divorce:Fault		<input type="checkbox"/> Employment		<input type="checkbox"/> Removal of Minority		<input type="checkbox"/> Eviction	
<input type="checkbox"/> Divorce: Irreconcilable Diff.		<input type="checkbox"/> Foreign Judgment		<input type="checkbox"/> Other _____		<input type="checkbox"/> Judicial Foreclosure	
<input type="checkbox"/> Domestic Abuse		<input type="checkbox"/> Garnishment		<input type="checkbox"/> Civil Rights		<input type="checkbox"/> Lien Assertion	
<input type="checkbox"/> Emancipation		<input type="checkbox"/> Replevin		<input type="checkbox"/> Elections		<input type="checkbox"/> Partition	
<input type="checkbox"/> Modification		<input type="checkbox"/> Other _____		<input type="checkbox"/> Expungement		<input type="checkbox"/> Tax Sale: Confirm/Cancel	
<input type="checkbox"/> Paternity		<input type="checkbox"/> Probate		<input type="checkbox"/> Habeas Corpus		<input type="checkbox"/> Title Boundary or Easement	
<input type="checkbox"/> Property Division		<input type="checkbox"/> Accounting (Probate)		<input type="checkbox"/> Post Conviction Relief/Prisoner		<input type="checkbox"/> Other _____	
<input type="checkbox"/> Separate Maintenance		<input type="checkbox"/> Birth Certificate Correction		<input type="checkbox"/> Other _____		<input type="checkbox"/> Torts	
<input type="checkbox"/> Termination of Parental Rights		<input type="checkbox"/> Commitment		<input type="checkbox"/> Contract		<input type="checkbox"/> Bad Faith	
<input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA)		<input type="checkbox"/> Conservatorship		<input type="checkbox"/> Breach of Contract		<input type="checkbox"/> Fraud	
<input type="checkbox"/> Other _____		<input type="checkbox"/> Guardianship		<input type="checkbox"/> Installment Contract		<input type="checkbox"/> Loss of Consortium	
<input type="checkbox"/> Appeals		<input type="checkbox"/> Helship		<input type="checkbox"/> Insurance		<input type="checkbox"/> Malpractice - Legal	
<input type="checkbox"/> Administrative Agency		<input type="checkbox"/> Intestate Estate		<input type="checkbox"/> Specific Performance		<input type="checkbox"/> Malpractice - Medical	
<input type="checkbox"/> County Court		<input type="checkbox"/> Minor's Settlement		<input type="checkbox"/> Other _____		<input type="checkbox"/> Mass Tort	
<input type="checkbox"/> Hardship Petition (Driver License)		<input type="checkbox"/> Muniment of Title		<input type="checkbox"/> Statutes/Rules		<input type="checkbox"/> Negligence - General	
<input type="checkbox"/> Justice Court		<input type="checkbox"/> Name Change		<input type="checkbox"/> Bond Validation		<input type="checkbox"/> Negligence - Motor Vehicle	
<input type="checkbox"/> MS Dep. Agency (Non-Resident)		<input type="checkbox"/> Testate Estate		<input type="checkbox"/> Civil Forfeiture		<input type="checkbox"/> Product Liability	
<input type="checkbox"/> Worker's Compensation		<input type="checkbox"/> Will Contest		<input type="checkbox"/> Declaratory Judgment		<input type="checkbox"/> Subrogation	
<input type="checkbox"/> Other _____		<input type="checkbox"/> Other _____		<input type="checkbox"/> Filed on _____ Order		<input type="checkbox"/> Wrongful Death	
Other Civil Rights Violation _____							

IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
 FIRST JUDICIAL DISTRICT, CITY OF _____

Docket No. _____ - _____ Docket No. If Filed
 File Yr _____ Chronological No. _____ Clerk's Local ID _____ Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of _____ Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: WILLIAMS SHAWN Last Name First Name Maiden Name, if Applicable Middle Init. J/S/M/L/V

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business 1400 28TH STREET, GULFPORT, MS 39501

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #3:

Individual: VITTECK GEORGE Last Name First Name Maiden Name, if Applicable Middle Init. J/S/M/L/V

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business 16023 APRIL DRIVE, GULFPORT, MS 39503

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Defendant #4:

Individual: Last Name First Name Maiden Name, if Applicable Middle Init. J/S/M/L/V

Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

**IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D2401-15-1551

**CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS, GEORGE VITTECK and
JOHN DOES 1 - 5**

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

**TO: CITY OF GULFPORT
C/O BILLY HEWES, MAYOR
CITY HALL
15TH STREET
GULFPORT, MISSISSIPPI 39503**

NOTICE TO DEFENDANT

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

**You are required to mail or hand deliver a copy of a written response to the Complaint to
BROWN BUCHANAN P.A., whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-
1377. Your response must be mailed or delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a Judgment by Default will be entered against you for the money
or other things demanded in the Complaint.**

**You must file the original of your response with the Clerk of this Court within a reasonable
time afterward.**

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.

**Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502**

**BY: Gayle Parker
Deputy Clerk**

IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D2401-15-1551

CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS, GEORGE VITTECK and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: **GEORGE VITTECK**
16023 APRIL DRIVE
GULFPORT, MISSISSIPPI 39503

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to
**BROWN BUCHANAN P.A., whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-
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of this Summons and Complaint or a Judgment by Default will be entered against you for the money
or other things demanded in the Complaint.

You must file the original of your response with the Clerk of this Court within a reasonable
time afterward.

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.

Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502

BY: Gayle Parker
Deputy Clerk

IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. 24CO1-15-1551

CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS, GEORGE VITTECK and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: **SHAWN WILLIAMS**
1400 28TH STREET
GULFPORT, MISSISSIPPI 39501

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to **BROWN BUCHANAN P.A.**, whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-1377. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a Judgment by Default will be entered against you for the money or other things demanded in the Complaint.

You must file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.

Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502

BY:

Deputy Clerk

County Court District 1
Gayle Parker, Circuit Clerk
1801 23rd Avenue
Gulfport, MS 39501
(228) 865-4230

Received From:	Buchanan, Patrick R. BROWN, BUCHANAN AND SESSOMS, P P O BOX 1377 BILOXI, MS 39533-1377	Date: 10/30/2015 Receipt #: 58624
Paying for:	Karlson, Georgia	Clerk: CAM
Transaction Type:	Civil	Reference #: 35328
Payment Type:	Check	Original Case #:
Total Paid	\$166.00	Comment:
Total Received	\$166.00	
Change Due	\$0.00	

Case #	Caption	Previous Balance	Amount Paid	Balance Due
024011501551	Georgia Karlson vs City Of Gulfport	\$166.00	\$166.00	\$0.00

IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D2401-15-1551

CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS, GEORGE VITTECK and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: SHAWN WILLIAMS
1400 28TH STREET
GULFPORT, MISSISSIPPI 39501

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to
BROWN BUCHANAN P.A., whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-
1377. Your response must be mailed or delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a Judgment by Default will be entered against you for the money
or other things demanded in the Complaint.

You must file the original of your response with the Clerk of this Court within a reasonable
time afterward.

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.



Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502

BY:

Allen Staton Jr.
Deputy Clerk

PROOF OF SERVICE - SUBPOENA
(Process Server)

Sharon Williams

(Name of person or entity served - Use separate proof of service for each person served).

I, the undersigned process served, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

- FIRST CLASS MAIL & ACKNOWLEDGMENT SERVICE.** By mailing (by first class mail, postage prepaid) copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).
- PERSONAL SERVICE.** I personally delivered copies to Sharon Williams on the 11 day of NOV, 2015, where I found said person in Harrison, County of MISSISSIPPI, State of MISSISSIPPI.
- RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within _____ County, _____. I served the summons and complaint on the _____ day of _____, 2015, at the usual place of abode of said person by leaving a true copy of the summons and complaint with _____ who is the _____, a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the _____ day of _____, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.
- CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attached signed return receipt or other evidence of actual delivery to the person served.)

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

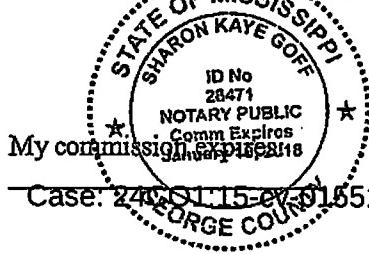
NAME: Nevi McInnis
ADDRESS: 45 Hwy. Court Box 245
TELEPHONE: 228 860 4199

STATE OF MISSISSIPPI
COUNTY OF

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Nevi McInnis, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Subpoena" are true and correct as therein stated.

PROCESS SERVER

SWORN TO AND SUBSCRIBED before me, this the 20 day of November, 2015.



Sharon Kaye Goff
NOTARY PUBLIC

IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI.
FIRST JUDICIAL DISTRICT

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D2401HS-1551

CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS , GEORGE VITTECK and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: **GEORGE VITTECK**
16023 APRIL DRIVE
GULFPORT, MISSISSIPPI 39503

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to
BROWN BUCHANAN P.A., whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-
1377. Your response must be mailed or delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a Judgment by Default will be entered against you for the money
or other things demanded in the Complaint.

You must file the original of your response with the Clerk of this Court within a reasonable
time afterward.

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.

Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502



BY: Ellen Statler
Deputy Clerk

PROOF OF SERVICE - SUBPOENA
(Process Server)

GEORGE VITTECK

(Name of person or entity served - Use separate proof of service for each person served).

I, the undersigned process served, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

- FIRST CLASS MAIL & ACKNOWLEDGMENT SERVICE.** By mailing (by first class mail, postage prepaid) copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (Attached completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).
- PERSONAL SERVICE.** I personally delivered copies to GEORGE VITTECK on the 11 day of Nov, 2015, where I found said person in Harrison, County of Harrison, State of MISSISSIPPI.
- RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within _____ County, _____. I served the summons and complaint on the _____ day of _____, 2015, at the usual place of abode of said person by leaving a true copy of the summons and complaint with _____ who is the _____, a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the _____ day of _____, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.
- CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attached signed return receipt or other evidence of actual delivery to the person served.)

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

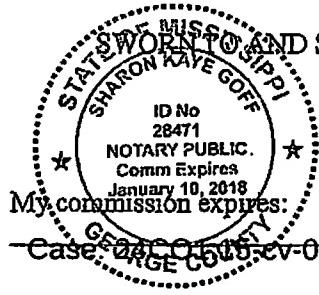
NAME: Neil McInnis
ADDRESS: 45 HARRY COURT BOX 293
TELEPHONE: 228 860 4199

STATE OF MISSISSIPPI
COUNTY OF

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Neil McInnis, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Subpoena" are true and correct as therein stated.

PROCESS SERVER

SWEORN TO AND SUBSCRIBED before me, this the 20 day of November, 2015.
Shawn Kaye Goff
NOTARY PUBLIC



IN THE COUNTY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

GEORGIA KARLSON

PLAINTIFF

VERSUS

CAUSE NO. D2401-15-1551

CITY OF GULFPORT, MISSISSIPPI,
SHAWN WILLIAMS, GEORGE VITTECK and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: CITY OF GULFPORT
C/O BILLY HEWES, MAYOR
CITY HALL
15TH STREET
GULFPORT, MISSISSIPPI 39503

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU
MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to
BROWN BUCHANAN P.A., whose address is Post Office Box 1377, Biloxi, Mississippi, 39533-
1377. Your response must be mailed or delivered within thirty (30) days from the date of delivery
of this Summons and Complaint or a Judgment by Default will be entered against you for the money
or other things demanded in the Complaint.

You must file the original of your response with the Clerk of this Court within a reasonable
time afterward.

ISSUED under my hand and seal of said Court, this the 30 day of October, 2015.



Gayle Parker, Clerk
County Court of Harrison County
Post Office Box 1461
Gulfport, MS 39502

BY: Ella Statler
Deputy Clerk

PROOF OF SERVICE - SUBPOENA
(Process Server)

CITY OF GULFPORT - Bully News

(Name of person or entity served - Use separate proof of service for each person served).

I, the undersigned process served, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

- **FIRST CLASS MAIL & ACKNOWLEDGMENT SERVICE.** By mailing (by first class mail, postage prepaid) copies to the person served, together with copies of the form of notice and acknowledgment and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).
- **PERSONAL SERVICE.** I personally delivered copies to Billy News c/o G/T on the 17 day of November 2015, where I found said person in Hallard, County of _____, State of _____.
- **RESIDENCE SERVICE.** After exercising reasonable diligence I was unable to deliver copies to said person within _____ County, _____. I served the summons and complaint on the _____ day of _____, 2015, at the usual place of abode of said person by leaving a true copy of the summons and complaint with _____ who is the _____, a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the _____ day of _____, 2015, I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.
- **CERTIFIED MAIL SERVICE.** By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attached signed return receipt or other evidence of actual delivery to the person served.)

At the time of service I was at least 18 years of age and not a party to this action.

Process server must list below: (Please print or type)

NAME: Neill McInnis
ADDRESS: 45 Hwy Court Box 243
TELEPHONE: 860 4199

STATE OF MISSISSIPPI
COUNTY OF _____

Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named Neill McInnis, who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Subpoena" are true and correct as therein stated.

PROCESS SERVER

Sharon Kaye Goff
NOTARY PUBLIC

